

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

**OLUTAYO ARIYO:
Pro Se**

**CIVIL
No. 2:23-cv-02835-NIQA**

**PLAINTIFF REQUESTS
A TRIAL BY JURY**

**THOMAS JEFFERSON UNIVERSITY
MEDICAL COLLEGE**

Defendants

HIGH PRIORITY DISCOVERY MATTERS PREVIOUSLY REQUESTED BUT STILL HAVE NOT BEEN RECEIVED FROM DEFENDANT ATTORNEY

Defendant 'opposition t Plaintiff's Motion for leave to Amend Document 33 filed 4/16 refers. Attached to this motion was my motion requesting a 2nd set of Discovery Documents.

Reason why, Defendant Attorney were so selective with regards to my 1st set of Discovery Documents requested for, as they were silent most especially with regards to some very high priority ones and for the ones returned were either classified as "not relevant" or captioned "unintelligible"

. I am not an Attorney, but a Pro se Litigant by DEFAULT, saddled with responsibilities I thought my former lawyer should have requested on my behalf.

Again, I became a Pro se litigant by Default and since not an Attorney, a novice unfortunately saddled with enormous responsibilities with about 100% expectation of an Attorney.

I am not aware if Discovery Documents a Plaintiff request from Defendant Attorney can be unilaterally denied. The underlisted Discovery items were all contained in my requested First set of Discovery materials. These are of High Priority and foundational pivotal in prosecuting my case against Thomas Jefferson, centered chiefly on discriminatory hiring and pay levels, and comparative promotional decisions relating to my 2 other peers, Dr. Hector Lopez (2005-2011?.and Dr. Guiyun Zhang 2010 till current.

These Documents are so fundamental to my case and had been requested as part of my requested 1st Set of Discovery

Documents. Contents of these requested contain concise specific details I cannot second guess, as FACTS DO MATTER.

These are

- Contents of the TJU Faculty Handbook, YRS. 2005-2007, 2013-2018 & 2022
- Pay scales for Research Associate at TH\JU between 2005& 2013.
- Salaries for the following academic Ranks, Instructor, Assistant Professor, Associate Professor,& Full Professor, YRS 2005-2006, 2013-2018, 2020 and 2022.
- Dr. Guiyun Zhang Annual Salary YRS 2013- 2022
- Dr. Guiyun Zhang current CV
- Dr. Hector Lopez (Last CV with Jefferson
- Dr. Hector Lopez (Salaries 2005-2011
- My submitted complaints to Ombudsman 2012 that details the confusion over my several concurrent designations and non-reconcilable from 2005-2013 viz: (YR2011-2012 or thereabout)

- -----Faculty Member as introduced with others to freshman class and on Handbook Manuals to Students
 - -----As Research ASSISTANT PROFESSOR on TJU Official Bulletin.
 - -----Research Associate1 TJU pay stub,
 - Complaints I made to Faculty Ombudsman relating to the toxic Hostile Working Environment created by Late Prof. Schmidt, Dr. Spudich and Dr. Zhang (YR 2018/2019 or thereabout.
- Olutayo Ariyo
Pro se Litigant,